

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

SHAWANDA JOHNSON SMITH,

Defendant

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Criminal No: 4:24-cr-00404-6

DEFENDANT JOHNSON-SMITH'S UNOPPOSED MOTION FOR MODIFICATION OF  
CONDITIONS OF SUPERVISED RELEASE

COMES NOW the Defendant SHAWANDA JOHNSON SMITH, through her undersigned counsel and respectfully requests that this Court grant Defendant's Unopposed Motion for Modification of the Conditions of her Supervised Release, for the following reasons.

I.

The Defendant hereby seeks permission from this Honorable Court to travel for work as she is a semi-truck driver and has received an Offer of Employment notice which will require her to travel out of the State. The defendant's offer letter for employment will be Exhibit A to this motion. She is on an electronic monitoring device as condition of supervised release, she is asking to remove her travel restrictions so she can remain in compliance with the bond conditions of her supervised release, as she has been for the preceding 7 months.

Respectfully submitted,

/s/Windi Akins Pastorini

Windi Akins Pastorini

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*Attorney for the Defendant*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I have reached out to Pretrial Officer Davis , and she is unopposed for the filing of this motion.

/s/ Windi Akins Pastorini

WINDI AKINS PASTORINI

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all parties of record, via electronic filing, in accordance with the Federal Rules governing the same, on this the fourth day of March 2025.

/w/Windi Akins Pastorini

Windi Akins Pastorini